

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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INESSA KLIMOVITSKY,

Case No. 21-CV-755 (MKB)(RER)

Plaintiff,

-against-

**ANSWER**

JG INNOVATIVE INDUSTRIES, INC.,  
JOSEPH GOTTLIEB, *Individually*,  
ANAT GEULA, *Individually*, and  
DOV MEDINA, *Individually*,

Defendants.

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The defendants J.G. INNOVATIVE INDUSTRIES INC., JOSEPH GOTTLIEB, ANAT GEULA and DOV MEDINA (hereinafter “Defendants”), by and through their attorneys, STEPHEN D. HANS AND ASSOCIATES, P.C., as and for their Answer to the first amended complaint dated and filed on May 24, 2021 (ECF Document No. 12) (hereinafter the “Complaint”) by plaintiff INESSA KLIMOVITSKY (hereinafter “Plaintiff”), respond as follows:

1. With respect to the allegations contained in Paragraph 1 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff’s claims as set forth in the Complaint’s Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court’s Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff’s remaining claims as set forth in the Complaint’s First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

2. With respect to the allegations contained in Paragraph 2 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff’s claims as set forth in the Complaint’s Fifth through Thirteenth Causes of Action, which claims were all dismissed

pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO PLAINTIFF'S  
ALLEGATIONS REGARDING "ADMINISTRATIVE PREREQUISITES"**

3. With respect to the allegations contained in Paragraph 3 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

4. With respect to the allegations contained in Paragraph 4 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

5. With respect to the allegations contained in Paragraph 5 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

6. With respect to the allegations contained in Paragraph 6 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO PLAINTIFF'S  
ALLEGATIONS REGARDING THE "PARTIES"**

7. With respect to the allegations contained in Paragraph 7 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

8. With respect to the allegations contained in Paragraph 8 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph; except that the Defendants admit only that the Plaintiff was formerly employed by J.G. Innovative Industries Inc. for a certain period of time.

9. With respect to the allegations contained in Paragraph 9 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants admit the allegations contained in such Paragraph.

10. With respect to the allegations contained in Paragraph 10 of the Complaint, the Defendants admit the allegations contained in such Paragraph.

11. With respect to the allegations contained in Paragraph 11 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

12. With respect to the allegations contained in Paragraph 12 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's

remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

13. With respect to the allegations contained in Paragraph 13 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

14. With respect to the allegations contained in Paragraph 14 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

15. With respect to the allegations contained in Paragraph 15 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

16. With respect to the allegations contained in Paragraph 16 of the Complaint, the Defendants admit the allegations contained in such Paragraph.

17. With respect to the allegations contained in Paragraph 17 of the Complaint, the Defendants admit the allegations contained in such Paragraph, except that the Defendants deny that Dov Medina is currently employed by J.G. Innovative Industries Inc.

18. With respect to the allegations contained in Paragraph 18 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph; except that the Defendants admit only that Anat Geula and Dov Medina were employed by J.G. Innovative Industries Inc. at its Kew Gardens office.

**AS AND FOR AN ANSWER TO PLAINTIFF'S  
ALLEGATIONS REGARDING "FACTUAL BACKGROUND"**

19. With respect to the allegations contained in Paragraph 19 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

20. With respect to the allegations contained in Paragraph 20 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

21. With respect to the allegations contained in Paragraph 21 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

22. With respect to the allegations contained in Paragraph 22 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph; except that the Defendants admit only that Dov Medina was an employee of J.G. Innovative Industries Inc. at the same time as Plaintiff and thus was a co-worker of Plaintiff.

23. With respect to the allegations contained in Paragraph 23 of the Complaint, the Defendants admit the allegations contained in such Paragraph.

24. With respect to the allegations contained in Paragraph 24 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such

allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

25. With respect to the allegations contained in Paragraph 25 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

26. With respect to the allegations contained in Paragraph 26 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

27. With respect to the allegations contained in Paragraph 27 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such

allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants admit the allegations contained in such Paragraph.

28. With respect to the allegations contained in Paragraph 28 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants admit the allegations contained in such Paragraph.

29. With respect to the allegations contained in Paragraph 29 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants admit the allegations contained in such Paragraph.

30. With respect to the allegations contained in Paragraph 30 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such



allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

31. With respect to the allegations contained in Paragraph 31 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants admit the allegations contained in such Paragraph.

32. With respect to the allegations contained in Paragraph 32 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph; except that the Defendants admit only that Anat Geula was the supervisor of both Plaintiff and Dov Medina.

33. With respect to the allegations contained in Paragraph 33 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed

pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

34. With respect to the allegations contained in Paragraph 34 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

35. With respect to the allegations contained in Paragraph 35 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

36. With respect to the allegations contained in Paragraph 36 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed

pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

37. With respect to the allegations contained in Paragraph 37 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

38. With respect to the allegations contained in Paragraph 38 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

39. With respect to the allegations contained in Paragraph 39 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed

pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

40. With respect to the allegations contained in Paragraph 40 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

41. With respect to the allegations contained in Paragraph 41 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

42. With respect to the allegations contained in Paragraph 42 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed

pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

43. With respect to the allegations contained in Paragraph 43 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

44. With respect to the allegations contained in Paragraph 44 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

45. With respect to the allegations contained in Paragraph 45 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed

pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

46. With respect to the allegations contained in Paragraph 46 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

47. With respect to the allegations contained in Paragraph 47 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

48. With respect to the allegations contained in Paragraph 48 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed

pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

49. With respect to the allegations contained in Paragraph 49 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

50. With respect to the allegations contained in Paragraph 50 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

51. With respect to the allegations contained in Paragraph 51 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed

pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

52. With respect to the allegations contained in Paragraph 52 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

53. With respect to the allegations contained in Paragraph 53 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

54. With respect to the allegations contained in Paragraph 54 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed



pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

55. With respect to the allegations contained in Paragraph 55 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

56. With respect to the allegations contained in Paragraph 56 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

57. With respect to the allegations contained in Paragraph 57 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

58. With respect to the allegations contained in Paragraph 58 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

59. With respect to the allegations contained in Paragraph 59 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

60. With respect to the allegations contained in Paragraph 60 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph, and assert that Plaintiff did not work in excess of 40 hours per week.

61. With respect to the allegations contained in Paragraph 61 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

62. With respect to the allegations contained in Paragraph 62 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

63. With respect to the allegations contained in Paragraph 63 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

64. With respect to the allegations contained in Paragraph 64 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

65. With respect to the allegations contained in Paragraph 65 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph; except that the Defendants admit only that Plaintiff purports to seek recovery of punitive damages in this action.

66. With respect to the allegations contained in Paragraph 66 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph; except that the Defendants admit only that Plaintiff purports to seek recovery of attorney's fees, costs, disbursements, and expenses incurred in this action.

67. With respect to the allegations contained in Paragraph 67 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "FIRST CAUSE OF ACTION"**

68. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

69. With respect to the allegations contained in Paragraph 69 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph; except that the Defendants admit only that Plaintiff was formerly employed by J.G. Innovative Industries Inc.

70. With respect to the allegations contained in Paragraph 70 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

71. With respect to the allegations contained in Paragraph 71 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

72. With respect to the allegations contained in Paragraph 72 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

73. With respect to the allegations contained in Paragraph 73 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

74. With respect to the allegations contained in Paragraph 74 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

75. With respect to the allegations contained in Paragraph 75 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

76. With respect to the allegations contained in Paragraph 76 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

77. With respect to the allegations contained in Paragraph 77 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "SECOND CAUSE OF ACTION"**

78. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

79. With respect to the allegations contained in Paragraph 79 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

80. With respect to the allegations contained in Paragraph 80 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph; except that the Defendants admit only that Anat Geula is an employee of J.G. Innovative Industries Inc. and that Plaintiff and Dov Medina are both former employees of J.G. Innovative Industries Inc.

81. With respect to the allegations contained in Paragraph 81 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

82. With respect to the allegations contained in Paragraph 82 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

83. With respect to the allegations contained in Paragraph 83 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

84. With respect to the allegations contained in Paragraph 84 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "THIRD CAUSE OF ACTION"**

85. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

86. With respect to the allegations contained in Paragraph 86 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

87. With respect to the allegations contained in Paragraph 87 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

88. With respect to the allegations contained in Paragraph 88 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

89. With respect to the allegations contained in Paragraph 89 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

90. With respect to the allegations contained in Paragraph 90 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

91. With respect to the allegations contained in Paragraph 91 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "FOURTH CAUSE OF ACTION"**

92. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

93. With respect to the allegations contained in Paragraph 93 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

94. With respect to the allegations contained in Paragraph 94 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

95. With respect to the allegations contained in Paragraph 95 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

96. With respect to the allegations contained in Paragraph 96 of the Complaint, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "FIFTH CAUSE OF ACTION"**

97. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

98. With respect to the allegations contained in Paragraph 98 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

99. With respect to the allegations contained in Paragraph 99 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

100. With respect to the allegations contained in Paragraph 100 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be

deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

101. With respect to the allegations contained in Paragraph 101 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

102. With respect to the allegations contained in Paragraph 102 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "SIXTH CAUSE OF ACTION"<sup>1</sup>**

103. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

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<sup>1</sup> Defendants note for purposes of clarity that certain of the numbered paragraphs comprising the Plaintiff's "Sixth Cause of Action" in the Complaint repeat the same numbers as certain of the numbered paragraphs comprising the Plaintiff's "Fifth Cause of Action."

104. With respect to the allegations contained in the second numbered paragraph enumerated as Paragraph 99 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

105. With respect to the allegations contained in the second numbered paragraph enumerated as Paragraph 100 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

106. With respect to the allegations contained in the second numbered paragraph enumerated as Paragraph 101 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the



Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

107. With respect to the allegations contained in the second numbered paragraph enumerated as Paragraph 102 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

108. With respect to the allegations contained in Paragraph 103 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

109. With respect to the allegations contained in Paragraph 104 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be

deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

110. With respect to the allegations contained in Paragraph 105 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "SEVENTH CAUSE OF ACTION"**

111. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

112. With respect to the allegations contained in Paragraph 107 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

113. With respect to the allegations contained in Paragraph 108 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's

claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

114. With respect to the allegations contained in Paragraph 109 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

115. With respect to the allegations contained in Paragraph 110 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

116. With respect to the allegations contained in Paragraph 111 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's

claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

117. With respect to the allegations contained in Paragraph 112 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

118. With respect to the allegations contained in Paragraph 113 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "EIGHTH CAUSE OF ACTION"**

119. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

120. With respect to the allegations contained in Paragraph 115 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

121. With respect to the allegations contained in Paragraph 116 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

122. With respect to the allegations contained in Paragraph 117 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be

deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

123. With respect to the allegations contained in Paragraph 118 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

124. With respect to the allegations contained in Paragraph 119 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

125. With respect to the allegations contained in Paragraph 120 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be

deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "NINTH CAUSE OF ACTION"**

126. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

127. With respect to the allegations contained in Paragraph 122 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

128. With respect to the allegations contained in Paragraph 123 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

129. With respect to the allegations contained in Paragraph 124 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's

claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

130. With respect to the allegations contained in Paragraph 125 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

131. With respect to the allegations contained in Paragraph 126 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.



**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "TENTH CAUSE OF ACTION"**

132. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

133. With respect to the allegations contained in Paragraph 128 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

134. With respect to the allegations contained in Paragraph 129 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

135. With respect to the allegations contained in Paragraph 130 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be

deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

136. With respect to the allegations contained in Paragraph 131 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "ELEVENTH CAUSE OF ACTION"**

137. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

138. With respect to the allegations contained in Paragraph 133 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

139. With respect to the allegations contained in Paragraph 134 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's

claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

140. With respect to the allegations contained in Paragraph 135 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "TWELFTH CAUSE OF ACTION"**

141. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

142. With respect to the allegations contained in Paragraph 137 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the

Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

143. With respect to the allegations contained in Paragraph 138 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

144. With respect to the allegations contained in Paragraph 139 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

145. With respect to the allegations contained in Paragraph 140 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the

Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "THIRTEENTH CAUSE OF ACTION"**

146. The Defendants repeat and reassert each and every one of the responses contained in the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

147. With respect to the allegations contained in Paragraph 142 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

148. With respect to the allegations contained in Paragraph 143 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

149. With respect to the allegations contained in Paragraph 144 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were

all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

150. With respect to the allegations contained in Paragraph 145 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO PLAINTIFF'S  
ALLEGATIONS REGARDING "INJURY AND DAMAGES"**

151. With respect to the allegations contained in Paragraph 146 of the Complaint, the Defendants assert that the allegations set forth in such Paragraph relate solely to the Plaintiff's claims as set forth in the Complaint's Fifth through Thirteenth Causes of Action, which claims were all dismissed pursuant to the Court's Order dated December 1, 2021. As such, Defendants state that such allegations do not require a response herein. However, to the extent that a response may be deemed required, and/or to the extent that any such allegations may be deemed relevant to the Plaintiff's remaining claims as set forth in the Complaint's First through Fourth Causes of Action, the Defendants deny all of the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO  
PLAINTIFF'S "PRAYER FOR RELIEF"**

152. The Defendants deny any and all factual allegations set forth in the Plaintiff's Prayer for Relief, including in subparagraphs (A) through (L) thereof, and further deny that Plaintiff is entitled to any of the relief sought therein.

**AFFIRMATIVE DEFENSES AND OTHER DEFENSES**

The Defendants assert the following affirmative defenses and other defenses without assuming any burden of production or proof that they would not otherwise have. The Defendants further assert that, to the extent that the Plaintiff's claims as alleged are vague or unclear, so as to render it difficult or impossible to identify and assert every possible affirmative defense or other defense, the Defendants hereby expressly reserve their rights to assert additional defenses should further proceedings in this action, including the progress of any discovery, reveal that such additional defenses would be applicable and appropriate.

**AS AND FOR A FIRST DEFENSE TO THE PLAINTIFF'S COMPLAINT**

The statements and allegations contained in the Plaintiff's Complaint may fail to state any valid claim(s) upon which relief can be granted as a matter of fact and/or law.

**AS AND FOR A SECOND DEFENSE TO THE PLAINTIFF'S COMPLAINT**

The Defendants state, in the alternative if necessary, that their actions or omissions with respect to the Plaintiff were taken in good faith, with reasonable belief that such conduct comported with the requirements of federal and state law.

**AS AND FOR A THIRD DEFENSE TO THE PLAINTIFF'S COMPLAINT**

The Defendants state, in the alternative if necessary, that if they are found to have violated any law or regulation, that any such violation was not willful.

**AS AND FOR A FOURTH DEFENSE TO THE PLAINTIFF'S COMPLAINT**

Although the Defendants deny owing any unpaid wages or other amounts to Plaintiff, in the alternative, if Defendants are found to owe any monies to Plaintiff, whatever monies are said to be owed should be offset by exclusions, exceptions, credits, recoupments, or offsets permissible under the Fair Labor Standards Act and New York Labor Law.

**AS AND FOR A FIFTH DEFENSE TO THE PLAINTIFF'S COMPLAINT**

The Plaintiff's claims may be barred, in whole or in part, because some or all of the Defendants were not the Plaintiff's "employer" as such term may be defined under applicable federal and state laws and regulations.

**AS AND FOR A SIXTH DEFENSE TO THE PLAINTIFF'S COMPLAINT**

The Plaintiff is exempt from the applicable provisions of the Fair Labor Standards Act and New York Labor Law because Plaintiff was employed in a bona fide administrative capacity, as defined by federal and state law.

**RESERVATION OF RIGHTS TO ASSERT ADDITIONAL DEFENSES**

The Defendants state that they currently have insufficient knowledge or information on which to form a belief as to whether they may have additional, as yet unstated, defenses available. As such, the Defendants expressly reserve the right to assert additional defenses, and to seek to amend this answer to include any such additional defenses, in the event that discovery indicates that any such additional defenses would be appropriate.



WHEREFORE, the Defendants respectfully request that judgment be entered by this Court dismissing all claims in the Plaintiff's Complaint, with prejudice, and granting such further relief as may be just and proper.

Dated: Long Island City, New York  
December 15, 2021

STEPHEN D. HANS & ASSOCIATES, P.C.

By: /s/Nils C. Shillito  
Nils C. Shillito (NS-6755)  
30-30 Northern Boulevard, Suite 401  
Long Island City, New York 11101  
Tel: 718.275.6700  
*Attorneys for the Defendants*